

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

UNITED STATES OF AMERICA

PLAINTIFF

VS.

NO.: 3:16-CV-489-CWR-JCG

HINDS COUNTY, MISSISSIPPI, *et al.*

DEFENDANT

DECLARATION OF MAJOR KATHRYN BRYAN

Pursuant to 28 U.S.C. § 1746, I, Kathryn Bryan, state as follows:

1. I am over twenty-one (21) years of age and have personal knowledge of the information provided herein.

2. I am the Detention Administrator for the Raymond Detention Center (“RDC”) in Hinds County, Mississippi (“the County”). I am also a Certified Jail Manager through the American Jail Association.

3. In June 2021, the County hired me to serve as the Detention Administrator for the RDC. After relocating to Mississippi, my first day at RDC was July 19, 2021. That same week, I contracted COVID-19, and I was out sick the weeks of July 26-30, 2021 and August 2-6, 2021. I did not return to work until August 9, 2021.

4. When I began serving as Detention Administrator at RDC, I inherited the existing command staff. Over the next four months, I evaluated and made changes to that staff. As of December 1, 2021, I now have in place a command staff of my choosing. This staff includes Anthony Simon, Chief of Detention Officers and the former Facility Commander who successfully oversaw the Work Center. This staff also includes Jarvis Conner, Facility Commander at the RDC, and Jamie Caston, Facility Commander at the Work Center. Each of these individuals have enrolled in training to obtain national certification as jail managers.

5. I also have developed an updated staffing plan for the RDC. Under this updated staffing plan, the facility is to be staffed for direct supervision.

6. When hiring staff at the RDC, cadets must undergo a four week training process. The County recently transitioned the training program to me from the Sheriff and this has allowed me, in conjunction with the training officer on my staff, to plan improvements to the training curriculum for detention staff.

7. Before we can assemble and begin training a cadet class, the County must identify and vet the potential new cadets, and the vetting process renders some recruits ineligible for employment at the detention center due to failed background checks. Even for those recruits who get past a background check, we must remain vigilant to intercept and remove recruits who have a previously undetected gang affiliation or who attempt to bring contraband into the facility.

8. In November 2021, recruiter Bernard Moore was reassigned to me to strengthen recruiting efforts related to the RDC and the Work Center. Moore is a dedicated recruiter focusing on identifying and attracting potential new recruits for the RDC. We endeavor to hold the four week cadet classes for new recruits at least every other month, and the latest cadet class started November 18, 2021 and is expected to be completed on December 17, 2021.

9. With respect to staff retention, Hinds County's Board of Supervisors approved a five (5) percent pay raise for all staff at the RDC along with premium pay. The November 2021 paycheck received by staff included this raise. In October 2021, I coordinated with Matt Rivera, a third-party consultant recommended by the Department of Justice, to have Rivera analyze and report on retention efforts at the RDC. Rivera provided a report to me in October 2021, and he and I are currently in communication regarding the report and retention efforts at the facility.

10. In addition to these recruiting and retention efforts, we have reallocated and repurposed existing staff at the RDC to increase efficiency of operations. Aside from Bernard Moore being reassigned to me for recruiting efforts, I have also tasked Miioka Laster, RDC's fire safety officer, with the additional responsibility of serving as a medical liaison, which requires Laster to escort detainees to and from the medical clinic and escort medical staff on pill call at RDC. Having Laster assist as medical liaison alleviates command staff from having to pull other detention staff from their posts to escort medical staff, and having him accompany medical staff during pill call has reduced the number of treatment- and medication-noncompliant detainees, in my opinion. I also believe this move has increased the ability of medical and mental health staff to interact with detainees. My staff and I are also working to install a field training officer ("FTO") program at RDC to help facilitate continued training of existing detention officers, and we currently are preparing a curriculum and scheduling FTO training for early 2022.

11. Currently, we are working to transition RDC to operate as a direct supervision facility. Direct supervision is a key part of my facility management philosophy. To date, the County has devoted resources to renovating the living units at the facility in an effort to set those units up for direct supervision.

12. We also have looked to make certain that detention officers conduct security rounds at required intervals. To that end, the County recently approved a request for funding to purchase and install an electronic round system, which operates using buttons mounted on the walls throughout a living unit, to monitor whether and when rounds are made by officers. The system requires officers, each of whom are assigned an electronic wand to keep with them during a shift, to physically walk to each button in the living unit to which they are assigned on a given shift and place the wand into contact with the button to electronically document that the officer has walked

by the button while making rounds in the units. Once installed, the system will allow my command staff and me to identify those officers who are and are not conducting rounds.

13. On October 18, 2021, we experienced the death of a detainee after he was assaulted. In November 2021, I conducted an investigation into the circumstances surrounding this detainee's death and completed an after-action report. I expect the report may be something my staff and I can use to aid us in our effort to minimize the potential for a similar event in the future.

14. With respect to medical and mental healthcare at RDC, a new Health Services Administrator, Ebbonie Taylor-Winfield, was assigned to RDC in August 2021. Since that time, Taylor-Winfield and I have developed a good working relationship and am pleased with her work. The County also has renegotiated its agreement with Quality Correctional Healthcare ("QCHC"), the contractor providing medical and mental healthcare at RDC. Pursuant to this new contract, RDC will have a full-time mental health nurse practitioner beginning in January 2022, and there will also be an additional mental health practitioner and an additional medical practitioner at RDC.

15. Beyond these developments, RDC is engaged in a comprehensive effort to train all detention officers related to handling detainees with mental health issues. I am working with a nationally certified mental health training professional to provide three separate, intensive sessions of mental health training to detention officers. The first of these three training sessions has already taken place, the second session is scheduled for December 21, 2021, and the third is scheduled for early 2022. I have also increased collaboration between medical and mental health staff and detention staff, and, in my view, this has increased security for medical and mental health professionals at RDC and reduced turnover of those professionals.

16. The County also has under construction a dedicated mental health living unit, Unit B-1. The unit is undergoing renovations which will allow it to serve as the RDC's unit for detainees

with serious mental illnesses, giving us dedicated space for detaining such individuals and for providing therapeutic programming to them. In addition to the renovations to Unit B-1, the County is adding mental health office space immediately adjacent to Unit B-1 to assist in providing care between mental health staff and detainees in Unit B-1. I anticipate that Unit B-1 should be ready for use as a mental health unit within sixty (60) days.

17. Since coming onsite as administrator of the Raymond Detention Center in August 2021, I have started holding weekly interdisciplinary team meetings, or “IDT Meetings.” These meetings are intended to allow me to meet with members of the classification staff, mental healthcare staff, and detention staff so we can come together on a weekly basis, assess those detainees with mental health issues, and coordinate our efforts to provide care and security for those detainees. IDT meetings likely will help address suicide risk and facilitate care for at risk detainees.

18. With respect to efforts to address and minimize the risk of suicides at RDC, we currently have two padded rooms under construction, and once completed, these rooms will be used to aid efforts to monitor and control detainees who present suicidal threats. I also suspect that as we roll out direct supervision at the facility, the closer supervision will supplement ongoing suicide prevention efforts. In addition, since September 2021, medical staff no longer discharge detainees from suicide watch directly back into living units. Instead, we are using a “step-down” system resulting in medical staff now placing detainees from suicide watch into medical observation for a limited number of days until the detainees are evaluated as being ready to return back to the living units.

19. My staff and I are engaged in a concerted effort to combat the introduction of contraband into RDC. For example, on November 3, 2021, I issued a directive to all staff related

to contraband. This directive, along with other efforts, have not been without impact. Within the last month, detention staff intercepted and stopped two staff members attempting to bring contraband into the facility and the County is not simply terminating such staff when caught. The County those individuals arrested and charged with crimes, and the individuals recently caught were no exception. The County also now has two investigators dedicated to RDC, the second of which has only been at the facility since October 2021. I expect that over time the presence of two investigators at the facility will only serve to strengthen the County's ability to fight the introduction and possession of contraband at the facility.

20. With respect to cell doors and locking mechanisms, the County moved quickly to vet and approve a contract with Georgia Detention Services, an experienced detention services contractor, pursuant to which Georgia Detention Services has replaced the locking mechanisms on various doors throughout the facility. Georgia Detention Services also is providing maintenance to those locks and will provide maintenance training to County employees.

21. Aside from these cells, the County is engaged in an overarching effort to maintain and sanitize RDC. The County has contracted with a third party pest-control company that treats RDC on a monthly basis. Detainee-workers perform daily cleaning and sanitizing services throughout RDC's common areas. In addition, we make cleaning products available to detainees in their living units on a regular basis so that detainees can clean their personal living areas.

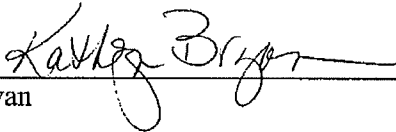
22. With regard to maintenance of the facility, the County recently dedicated and assigned two maintenance employees to focus exclusively on maintenance issues at RDC.

23. With regard to fire safety, in addition to the work being done to install fire alarms, RDC staff are testing the fire alarms on a monthly basis.

24. With respect to the issue of detainees being held at RDC despite being adjudicated “not guilty,” we are working with Securus, a third party contractor, to establish a virtual communications platform through which detainees will have greater ability to communicate with their attorneys while doing so in a private, secure setting. In addition, RDC staff are conducting an ongoing audit of detainee files at the facility.

I declare under the penalties of perjury that the foregoing information is true and correct to the best of my knowledge.

EXECUTED on this the 14th day of December, 2021.



Kathryn Bryan